

Exhibit 8

1 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

3) MDL NO.
IN RE: JOHNSON & JOHNSON) 16-2738 (FLW) (LHG)
4)
TALCUM POWDER PRODUCTS)
5)
MARKETING, SALES PRACTICES)
AND PRODUCTS LIABILITY)
5)
LITIGATION)
6)
THIS DOCUMENT RELATES TO ALL)
7)
CASES)
_____)

11 PURSUANT TO NOTICE, the videotaped 30(b)(6)
12 deposition of Imerys Talc America, Inc., through the
13 oral testimony of JULIE PIER - VOLUME II was taken on
14 behalf of the Plaintiffs, at Gordon & Rees, 555
15 Seventeenth Street, Suite 3400, Denver, Colorado, on
16 September 13, 2018, commencing at 9:37 a.m., before
17 Melanie L. Giamarco, Registered Merit Reporter,
18 Certified Realtime Reporter, Registered Professional
19 Reporter and Notary Public within Colorado.

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<p>1 done in Vermont prior to 2003.</p> <p>2 Can you describe that process to me? So</p> <p>3 samples I know were randomly taken from the piles</p> <p>4 of milled talc, right?</p> <p>5 A. Samples were taken -- taken using,</p> <p>6 again, an automatic sampler while the silos are</p> <p>7 being filled of finished product.</p> <p>8 Q. Can you tell me what that looks like?</p> <p>9 What is an automatic sampler? What -- do you know</p> <p>10 how that works?</p> <p>11 A. I think that would be a question for</p> <p>12 Pat.</p> <p>13 Q. Have you ever seen it yourself?</p> <p>14 A. I believe I have.</p> <p>15 Q. Can -- understanding that may not be</p> <p>16 your expertise, what did you see? What did it look</p> <p>17 like? Is it a conveyor belt? Is it a machine?</p> <p>18 What is it?</p> <p>19 A. I don't think I can remember well enough</p> <p>20 to be able to describe it.</p> <p>21 Q. Are you saying you don't know how those</p> <p>22 samples are chosen?</p> <p>23 A. No. I'm saying there is an automatic</p> <p>24 sampler that samples a given amount of powder at</p> <p>25 periodic time intervals.</p>	<p>1 aggregated into one big sample?</p> <p>2 A. All -- all what samples?</p> <p>3 Q. Well, you're saying -- you used the term</p> <p>4 "composite."</p> <p>5 What is a composite?</p> <p>6 A. Well, it's the -- it's the result of</p> <p>7 taking the individual samples that represent</p> <p>8 individual silos for a given -- for a given date.</p> <p>9 And those samples are individual samples. A</p> <p>10 portion is taken of each of those for the date</p> <p>11 range in question. And for that quarter, it -- I</p> <p>12 don't know how many samples it might -- might be,</p> <p>13 six or ten. I don't know. A portion of each</p> <p>14 sample is then put into a different container, and</p> <p>15 that container represents the composite for the</p> <p>16 month.</p> <p>17 Q. Are those portions of the individual</p> <p>18 samples, when they're put in that container, all</p> <p>19 put into the same container?</p> <p>20 A. Yes.</p> <p>21 Q. So they're mixed?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. So what you have in a composite</p> <p>24 sample is a mixture of small portions of the</p> <p>25 individual samples that were pulled out as the talc</p>
<p style="text-align: center;">Page 414</p> <p>1 Q. But you don't know how that automatic</p> <p>2 sampler takes samples?</p> <p>3 A. There's a stream of powder that goes to</p> <p>4 the silo, and there is a -- some sort of valve</p> <p>5 that, at periodic intervals, causes a little bit of</p> <p>6 the talc stream to be collected somewhere into a</p> <p>7 container.</p> <p>8 Q. Okay. Now I understand.</p> <p>9 A. That's as far as I can --</p> <p>10 Q. Okay. So what happens with those</p> <p>11 samples that are taken before it goes to the silo?</p> <p>12 A. Those samples are analyzed by x-ray</p> <p>13 diffraction.</p> <p>14 Q. Are they eventually analyzed by TEM?</p> <p>15 A. They are then composited into a</p> <p>16 quarterly composite.</p> <p>17 Q. What does that mean, "They are</p> <p>18 composited into a quarterly composite"?</p> <p>19 A. Well, you have individual samples that</p> <p>20 represent whatever silo on whatever date, and those</p> <p>21 samples are then -- a portion taken from each of</p> <p>22 those samples for the given date range that</p> <p>23 includes a quarter, and a separate sample is made</p> <p>24 from those for the TEM.</p> <p>25 Q. And then are all those samples</p>	<p style="text-align: center;">Page 416</p> <p>1 was progressing to the silo?</p> <p>2 A. That's correct. You have a</p> <p>3 representation, then, of all of the individual</p> <p>4 samples that made up the silo samples.</p> <p>5 Q. And each composite represents a period</p> <p>6 of time?</p> <p>7 A. That's right.</p> <p>8 Q. And then, when you go to test the</p> <p>9 composite by TEM, do you just scoop out 100</p> <p>10 nanograms? How does that work?</p> <p>11 A. It is thoroughly mixed, and</p> <p>12 approximately .25 grams is taken out of the</p> <p>13 mixture. And I can describe the whole process, if</p> <p>14 you would like.</p> <p>15 Q. Sure.</p> <p>16 A. It -- the .25 grams, 0.25 grams, is put</p> <p>17 into a container and a suspension is made. Water</p> <p>18 is added. And that container represents 100</p> <p>19 milliliters of water plus sample.</p> <p>20 Q. Is it filtered water?</p> <p>21 A. It is, yes.</p> <p>22 Q. Is it triple-filtered water?</p> <p>23 A. It's particle-free water, yes.</p> <p>24 Q. Where does the water come from?</p> <p>25 A. It's purchased.</p>

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<p>1 quarterly basis testing occurring at Imerys for 2 talc ore?</p> <p>3 A. Currently, I don't think we have any 4 with a frequency of quarterly.</p> <p>5 Q. When did you, if ever, have -- Imerys -- 6 have a frequency of quarterly?</p> <p>7 A. The quarterly finished product was from 8 Vermont, and the finished product would have been 9 Grade 66. Those were quarterly samples at that 10 time.</p> <p>11 MR. GREEN: Could I have IMERYS 446800, 12 please? And that is Exhibit Number 25. (Exhibit 25 was marked for identification.)</p> <p>14 Q. Ms. Pier, let me show you what's been 15 marked for identification here and for the record 16 as Exhibit 25. When you get that . . .</p> <p>17 MR. GREEN: And Zach, thank you. If you 18 could call that out there. Thank you very much.</p> <p>19 Q. Do you have the exhibit, ma'am?</p> <p>20 A. I do, yes.</p> <p>21 Q. Is this exhibit familiar to you?</p> <p>22 A. This is -- this is output from the 23 database I was mentioning.</p> <p>24 Q. Yes, ma'am. And let me represent to you 25 so -- so the record will be clear and you might be</p>	<p>1 you're familiar with it, but I have to go through 2 this for the record.</p> <p>3 MR. KLATT: Objection; form.</p> <p>4 Q. (By Mr. Green) So please bear with me. 5 The next column is "Date Received 6 Analytical"; do you see that?</p> <p>7 A. I do, yes.</p> <p>8 Q. And is that the date that the sample is 9 received?</p> <p>10 A. I believe it is.</p> <p>11 Q. And then there's a column that says 12 "Completed"; do you see that column?</p> <p>13 A. I do, yes.</p> <p>14 Q. And this is where you, Imerys, fills in 15 the date when TEM testing was completed for the 16 sample, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And there's also a description of the 19 sample; do you see that --</p> <p>20 A. Yes, I do.</p> <p>21 Q. -- after "Requester"?</p> <p>22 A. I do.</p> <p>23 Q. And that description of the sample, that 24 takes the middle part of this exhibit, middle part 25 of that column; do you see that?</p>
<p style="text-align: center;">Page 546</p> <p>1 relieved, this document is produced by Imerys from 2 your custodial file. And you are listed as its 3 author in that production.</p> <p>4 I'm going to ask you this question: Is this 5 an example of a TEM sample log we were talking 6 about before?</p> <p>7 MR. KLATT: Objection; form.</p> <p>8 A. This is an output from the database that 9 includes all samples. So it's a specific query in 10 the database.</p> <p>11 Q. (By Mr. Green) And it would be an 12 example of that specific query; is that Imerys' 13 testimony? Is that correct?</p> <p>14 A. It would be, yes.</p> <p>15 Q. So let's look at the column headers.</p> <p>16 MR. GREEN: And if we could call those out, 17 Zach, please, those column headers in this 18 exemplar.</p> <p>19 Q. So as I understand -- I'm going to ask 20 you for your help. The column headers are -- 21 you're recording the project number.</p> <p>22 You see that's the first column on the left; 23 do you see that, ma'am?</p> <p>24 A. I do, yes.</p> <p>25 Q. And I know you're the author of this, so</p>	<p style="text-align: center;">Page 548</p> <p>1 A. I do, yes.</p> <p>2 Q. And to the right of that is a "Total" 3 column; do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And is that "Total" column, is that the 6 total numbers of samples received with the project 7 number?</p> <p>8 A. Yes, it is. That's correct.</p> <p>9 Q. And next to that is a "Complete" column; 10 do you see that?</p> <p>11 A. I do.</p> <p>12 Q. And that's where you record the number 13 of sample tests that had been completed; is that 14 correct?</p> <p>15 A. That's correct.</p> <p>16 Q. And so if you have one sample, and the 17 testing is complete, there would be a number "1" in 18 the "Complete" column; is that correct?</p> <p>19 A. I believe it would.</p> <p>20 Q. And the completion date in the "Date Completed" column would then be entered; is that 21 correct?</p> <p>22 A. That's correct, yes.</p> <p>23 Q. The next column is marked "To Do"; do 24 you see that column?</p>